

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SOLOMON FORTUNE, individually and on
behalf of all others similarly situated,

Plaintiff,

-against-

VIVENDI TICKETING US, LLC D/B/A SEE
TICKETS USA, LLC,

Defendant.

Case No. 1:24-cv-08415-JPC

**DECLARATION OF MARISA VEEH IN SUPPORT OF
DEFENDANT’S MOTION TO DISMISS COMPLAINT**

I, Marisa Veeh, hereby declare as follows:

1. I am over eighteen years old and of sound mind. My title is Executive Product Strategist for See Tickets – North America. I submit this declaration in support of Defendant Vivendi Ticketing US, LLC d/b/a See Tickets USA, LLC (“See Tickets”) Motion to Dismiss Complaint and Notice of Exhibits Incorporated by Reference and Request for Judicial Notice to place before the Court materials relevant to See Tickets’ Motion to Dismiss.

2. I participated in and oversaw the collection of the screen shots of the ticket flow purchases for the events alleged in the Complaint.

3. First, my team and I used the Customer Support Search tool to identify Plaintiff’s order history by inputting Plaintiff’s name. My team and I then identified the specific events in his order history by matching his purchase history with the dates listed in the Complaint.

4. Having identified the events, my team and I then accessed the event and created full page screen shots that reflect the purchase flow for the events on June 11, 2023 and October 21, 2023 identified in the Complaint.

5. Utilizing the date and description of the events set out in Figures 5, 7 through 9, and 11 of the Complaint, my team and I undertook the same process and created full page screen shots that reflect the purchase flow for the event on October 31, 2024.


6. Attached as Exhibit 1 to this Declaration are true and correct screenshots of the ticket purchase flow for the event on June 11, 2023 identified in Plaintiff's Complaint. Exhibit 1 at page 1A is the initial event page for the event on June 11, 2023. Page 1A is the first page a customer sees after selecting the June 11, 2023 event. Page 1B is the page a customer sees after they select the number of tickets to purchase and click "CHECKOUT" on the page shown at 1A. Page 1B displays the summary of charges, item total, fees, and total due. Page 1B also displays the order at the bottom, including the item price, quantity, fees, and total.

7. Attached as Exhibit 2 to this Declaration are true and correct screenshots of the ticket purchase flow for the event on October 21, 2023. Exhibit 2 at page 2A is the initial page for the event on October 21, 2023 identified in Plaintiff's Complaint. Page 2A is the first page a customer sees after selecting the October 21, 2023 event. Page 2B is the page a customer sees after they select the number of tickets to purchase and click "CHECKOUT" on the page shown at 2A. Page 2B displays the summary of charges, item total, fees, and total due on the righthand side. Page 2B also displays the order at the bottom, including the item price, quantity, fees, and total.

8. Attached as Exhibit 3 to this Declaration are true and correct screenshots of the ticket purchase flow for the event on October 31, 2024 identified in Plaintiff's Complaint and reflected in Figures 5, 7 through 9, and 11. Exhibit 3 at page 3A is the initial event page for the event on October 31, 2024 identified in Plaintiff's Complaint. Page 3A is the first page a customer sees after selecting the specific event. On page 3A, a customer can select the number of tickets to purchase and select "ADD TO CART," at which point the "Item Total," "Srv Fee," "Fac fee,"

“Tax” and “TOTAL DUE” are displayed, all on Page 3A. A customer can then select “CHECKOUT” and be taken to the display reflected on Page 3B. Page 3B again displays the “Total Due” on the upper right side under a link that reads “Show Breakdown.” At the bottom of page 3B, the ticket price details are provided under “Order Details,” including the number of tickets selected, total face value, service and facility fees, taxes, printing fee if applicable, and subtotal. Page 3C is a true and correct screenshot of the same page available on Page 3B, the only difference is that “Show Breakdown” is selected in this screenshot in the box on the upper right side. The box has a link with “Hide Breakdown” and the “Total Face Value,” “Service Fee,” “Facility Fee,” “Tax,” and “Total Due” displayed.

I declare under penalty of perjury that the foregoing is true and correct. Executed February 27, 2025, in Los Angeles, California.



Marisa Veeh